

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

LOUIS AGUILAR)
)
 Plaintiff,)
)
 v.) Case No. 4:19-00010-CV-RK
)
 THE CHILDREN'S MERCY HOSPITAL)
)
 Defendant.)
)

**JOINT MOTION FOR ENTRY OF CONFIDENTIALITY AGREEMENT
AND STIPULATED PROTECTIVE ORDER**

Plaintiff Louis Aguilar and Defendant, The Children's Mercy Hospital (collectively the "Parties") jointly move this Court for entry of a Confidentiality Agreement and Protective Order pursuant to Federal Rule of Civil Procedure 26(c). In support the Parties states as follows:

1. The Parties agree that during the course of discovery it may be necessary to disclose certain confidential information relating to the subject matter of this action. They agree that certain categories of such information should be treated as confidential, protected from disclosure outside this litigation, and used only for the purposes of prosecuting or defending this action and any appeals. The Parties jointly request entry of a Confidentiality Agreement and Protective Order to limit the disclosure, dissemination, and use of certain identified categories of confidential information.

2. The confidential information will likely include Confidential or private personnel, financial, or medical records or information regarding any party, including Plaintiff, Louis Aguilar or of any other current or former employee of Defendant, The Children's Mercy Hospital.

3. The Parties agree that the Confidentiality Agreement and Protective Order submitted to the Court will prevent the disclosure of confidential matters to persons or entities other than those involved in the prosecution or defense of this litigation and will facilitate the exchange of information between the Parties.

4. The entry of the Confidentiality Agreement and Protective Order is not being requested for any improper purpose.

WHEREFORE, Plaintiff Louis Aguilar and Defendant, The Children's Mercy Hospital jointly request that the Court enter the Confidentiality Agreement and Stipulated Protective Order submitted to the Court.

Dated: March 21, 2019

Respectfully submitted:

/s/ Timothy A. Hilton

Julianne P. Story MO Bar#42295
Timothy A. Hilton MO Bar #61622
Husch Blackwell LLP
4801 Main Street, Suite 1000
Kansas City, Missouri 64112
Telephone: (816) 983-8000
Facsimile: (816) 983-8080
julianne.story@huschblackwell.com
tim.hilton@huschblackwell.com

ATTORNEYS FOR DEFENDANT

/s/ Michael Stipetich

Michael Stipetich MO Bar#62291
Smith Mohlman Injury Law, LLC
751 E. 63rd Street, Suite 106
Kansas City, Missouri 64110
Telephone: (816) 866-7711
Facsimile: (816) 866-7715
stip@accidentlawkc.com

ATTORNEY FOR PLAINTIFF

CERTIFICATE OF FILING

I hereby certify that the foregoing Joint Motion For Confidentiality Agreement and Stipulated Protective Order was filed electronically with the United States District Court for the Western District of Missouri on March 21, 2019, which will automatically generate notice of filing to all counsel of record.

/s/ Timothy A. Hilton

Attorney for Defendant